

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE SATANIC TEMPLE, INC.,
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Plaintiff,
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v.
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NEWSWEEK DIGITAL, LLC
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Defendant.
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Case No. 1:22-cv-01343-MKV

**DEFENDANT’S STATEMENT OF UNDISPUTED MATERIAL FACTS
IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT**

Defendant Newsweek Digital, LLC (“Defendant” or “Newsweek”), by and through undersigned counsel, respectfully submits this Statement of Undisputed Material Facts pursuant to Local Rule 56.1 in support of its Motion for Summary.

The Parties

1. The Satanic Temple, Inc. (“Plaintiff” or “The Satanic Temple”) is an “atheistic religious corporation” with chapters throughout the United States. Compl. ¶ 6; *see also* Compl. ¶¶ 87, 89, 90 (identifying chapters of The Satanic Temple in Washington, West Florida, and Arizona).

2. The Satanic Temple was founded in or around 2013 or 2014. Deposition of Lucien Greaves, dated November 6, 2023 (“Greaves Depo.”), 6:23–7:2. (The excerpts from the Greaves Deposition cited herein are attached as Exhibit 1 to the Declaration of Cameron Stracher, dated May 17, 2024 (“Stracher Decl.”) filed herewith).

3. The Satanic Temple “engages in various charitable activities” and “advocates for the religious rights of its membership” through litigation, among other forms of advocacy.

Compl. ¶¶ 14, 15.

4. The Satanic Temple publishes press releases to promote Satanic Temple activities, campaigns, and issues. Greaves Depo. 26:14–27:13.

5. The press releases are sent to numerous media outlets. Greaves Depo. 30:2–7.

6. The Satanic Temple publishes press releases so that people are aware of the group and what it is doing. Deposition of Gregory Stevens, dated November 3, 2023 (“Stevens Depo.”), 141:23–142:4. (The excerpts from the Stevens Deposition cited herein are also attached as Exhibit 2 to the Stracher Declaration).

7. Through the press releases, The Satanic Temple sometimes has “specific political or specific initiatives which [it] promote[s].” Stevens Depo. 143:2–4.

8. The Satanic Temple relies on the public knowing about The Satanic Temple’s activities, including lawsuits it files, in order to generate donations. Greaves Depo. 38:5–15.

9. The Satanic Temple also uses billboards to advertise its initiatives. Stevens Depo. 146:12–147:11.

10. Greaves has done multiple interviews with Tucker Carlson, on Fox news radio, and with Chris Hayes on MSNBC, to discuss The Satanic Temple. Greaves Depo. 40:8–41:3.

11. Newsweek is a New York limited liability company that publishes the online news magazine *Newsweek* through its website at www.newsweek.com. Compl. ¶ 7.

12. Newsweek published the article at issue in this case, titled “Orgies, Harassment, Fraud: Satanic Temple Rocked by Accusations, Lawsuit” (the “Article”), which was written by Juila Duin. Compl. Ex. 1.

The Washington Lawsuit

13. In 2020, The Satanic Temple filed a lawsuit for defamation and “cyberpiracy” against several former members of its Washington Chapter in the United States District Court for the Western District of Washington (the “Washington Lawsuit”). *United Fed’n of Churches v. Johnson*, 522 F.Supp.3d 842 (W.D. Wash. 2021), *recons. denied*, 2022 WL 1093025 (W.D. Wash. 2022), *aff’d in part, vacated in part and remanded*, 2023 WL 8271978 (9th Cir., Nov. 30, 2023); Compl. ¶ 19.

14. The defendants in the Washington Lawsuit are David Alan Johnson, Leah Fishbaugh, Mickey Meeham (a/k/a Joshua Calavera), and Nathan Sullivan, who are former members of The Satanic Temple and now members of a group called Queer Satanic. *See gen., Johnson*, 522 F.Supp.3d 842.

15. Queer Satanic operates a social media account under the handle @QueerSatanic. 23 (“Duin Depo.”), 93:16–19; Deposition of Nathan Sullivan, November 17, 2023 (“Sullivan Depo.”), 6:15–17. (The excerpts from the Duin and Sullivan Depositions cited herein are also attached as Exhibits 3 and 4 to the Stracher Declaration).

The Article

Background

16. After the Washington Lawsuit was dismissed by the District Court, Newsweek reporter Julia Duin received an email from Kevin Jones, a journalist with the Catholic News Agency, stating that former members of The Satanic Temple had told him about The Satanic Temple’s alleged use of “defamation lawsuits . . . to harass internal critics.” Duin Depo. 37:16–38:9; Stracher Decl. Ex. 5 at JDUIN002.

17. Jones's email also stated that former members of The Satanic Temple had told him about "allegations of [The Satanic Temple] leadership sexually exploiting members or failing to respond to harassment/sexual assault allegations against chapter heads." *Id.*

18. Duin is a freelancer who worked for Newsweek as an independent contractor from September 1, 2021 until February 2023. Duin Depo. 29:3–4, 78:1–16.

19. Duin has been a journalist for over forty-five years. Duin Depo. 183:10–12.

20. Duin has received multiple awards for her reporting, including awards from the Religion News Writers Association, the Associated Press, and the Religion Communicators Council. Duin Depo. 11:13–12:9.

21. Duin has published six books about religion. Duin Depo. 15:5–21.

22. Duin served as a visiting journalism professor at the University of Alaska at Fairbanks, a visiting professor at Union University, an adjunct professor at the University of Maryland, and an adjunct professor at Patrick Henry University. Duin Depo. 15:22–16:11.

23. Duin has a master's degree in religious studies from Trinity Episcopal School for Ministry. Duin Depo. 88:4–19.

Researching the Article

24. In connection with her research for the Article, Duin communicated with the Queer Satanic members in person and via their @queersatanic social media account. *See* Duin Depo. 91:10–21 (referring to her in person interview with members of Queer Satanic); *id.* at 93:3–19 (referring to her social media communications with members of Queer Satanic); Stracher Decl. Ex. 6.

25. When Duin communicated with Nathan Sullivan, he told her that the Queer Satanic members had been removed from the Washington Chapter of The Satanic Temple

because they were copied on an ethics complaint, and that the ethics complaint involved the mismanagement of a sexual harassment complaint within the Washington Chapter. Sullivan Depo. 16:3–12; 22:11–23:21; Stracher Decl. Ex. 7.

26. Sullivan also sent Duin social media posts between a member of The Satanic Temple and The Satanic Temple’s International Council, in which the member claimed she was removed from groups within The Satanic Temple after publicly criticizing the behavior of Satanic Temple leaders for, among other things, making inappropriate sexual comments. Stracher Decl. Ex. 6.

27. When Duin communicated with David Johnson, he told her that he had been a witness to a sexual harassment complaint within The Satanic Temple. Deposition of David Johnson, November 17, 2023 (“Johnson Depo.”), 10:23–11:13. (The excerpts from the Johnson Deposition cited herein are also attached as Exhibit 8 to the Stracher Declaration).

28. On October 24, 2021, Duin emailed Scott Malphas, a former member of The Satanic Temple, and asked if he would “mind telling [her] what chapter you were part of . . . , when you left [The Satanic Temple] and why.” Stracher Decl. Ex. 9 at DUIN48-003.

29. Duin’s October 24th email to Malphas did not mention sexual abuse. *Id.*

30. In response to Duin’s email, Malphas stated that he would be “happy to share [his] experience with her,” and further stated:

There was an account of sexual assault, and the response was “we are looking into it,” then never followup [*sic*]. One individual was in charge of on-boarding new chapters . . . turns out they were using their authority to coerce potential chapter leaders into having sex. That person was protected by the national council and executive leadership, for months . . . until they finally “stepped down” and the allegations of statutory rape were never addressed.

[. . .]

The nail in the coffin for me was when I found out that the national council had been reviewing and approving official events that included orgies. [. . .] Well, shortly after the first celebration, national council released “sex-positive

guidelines.” It was clear that this was in response to the complaints of sexual assault; an effort to shed responsibility.

Stracher Decl. Ex. 9 at DUIN48-002–48-003.

31. On October 24, 2021, Duin emailed Jinx Strange (a/k/a Paul Millirons), another former member of The Satanic Temple, and asked if he would “mind telling [her] what chapter you were part of, when you left [The Satanic Temple] and why.” Stracher Decl. Exhibit 10 at NEWSWEEK017.

32. Duin’s October 24th email to Strange did not mention sexual abuse. *Id.*

33. Strange wrote a lengthy response to Duin, in which he stated that he had heard “concerning” stories from other members of The Satanic Temple, and that:

A lot of times those things were anecdotal or unsupported, but sometimes they were very concerning. Screenshots or images of things and connections I hadn’t seen before. Leaders posing happily with major alt-right media figures. Accounts of sexual abuse being covered up in ways that were more than anecdotal. Dozens of people kicked out for asking for financial records from this alleged-non-profit organization.

Stracher Decl. Ex. 10 at NEWSWEEK16.

34. Strange testified that by “sexual abuse” he meant “unwanted sexual advances or contact.” Deposition of Paul Millirons (a/k/a Jinx Strange), December 7, 2023 (“Strange Depo.”), 10:17–20. (The excerpts from the Strange Deposition cited herein are also attached as Exhibit 11 to the Stracher Declaration).

35. Strange explained that he ceased his involvement with The Satanic Temple after hearing accounts of sexual abuse and “observ[ing] behavior on social media by people [he] understood to be leaders in [The Satanic Temple],” which appeared to be efforts to cover up those allegations. Strange Depo. 11:7–15.

36. Strange said that he observed behavior that he “would not consider to be ethical or responsible . . . in response to these sort of [sexual abuse] allegations” and that “lent more credibility to those claims.” Strange Depo. 14:13–18.

37. In researching the Article, Duin learned that “there [were] multiple reports among . . . former members [of The Satanic Temple], of sexual abuse/harassment . . . whether it’s from Scott [Malphas] or from the Seattle members or from Jinx [Strange].” Duin Depo. 186:19–23.

38. Duin “found what [Strange] said to be inherently plausible” because it was consistent with other statements made by members of Queer Satanic and by Scott Malphas. Duin Depo. 121:23–123:9.

39. Duin found the sources who told her about allegations of sexual abuse within The Satanic Temple credible “[b]ecause [Scott Malphas] was a true believer when he came in, and so was Jinx. And they were all true believers, and they saw stuff they didn’t like, and they left. They all . . . wanted to believe. They all came in, and they believed in the organization, and they left not believing in it.” Duin Depo. 175:22–176:4.

40. Duin also interviewed Lucien Greaves, spokesperson and co-founder of The Satanic Temple as part of her research for the Article. Duin Depo. 103:13, 104:4–7; Greaves Depo. 14:10–12.

41. During Duin’s communications with Greaves, Greaves generally denied claims against The Satanic Temple. Duin Depo. 124:15–18, 126:17–24.

42. On October 29, 2021, Duin emailed Greaves and asked him about Malphas’s complaints that The Satanic Temple’s national council had been “approving official events that included orgies.” Stracher Decl. Ex. 12 at NEWSWEEK027.

43. In response, Greaves stated that “[n]o events are compulsory to continued membership within [The Satanic Temple].” *Id.*

44. Duin did not ask Greaves about Strange’s statement regarding accounts of sexual abuse because she felt Greaves’s general denial of allegations against The Satanic Temple, and his response to questions about “official orgies,” was a “fair rebuttal” to Strange’s statement as well. Duin Depo. 125:19–21, 127:5–18.

45. Greaves suggested Duin speak with Dr. Joseph Laycock, the author of *Speak of the Devil: How The Satanic Temple is Changing the Way We Talk about Religion*. Duin Depo. 104:1–3; Stracher Decl. Ex. 12 at NEWSWEEK028.

46. Duin interviewed Dr. Laycock as part of her research for the Article, and read excerpts from his book. Duin Depo. 103:22–104:8, 157:12–15.

47. Duin also interviewed Matt Kezhaya, The Satanic Temple’s general counsel, as part of her research on the Article. Duin Depo. 103:22–104:7.

Writing the Article

48. The focus of the article was the Washington Lawsuit. Duin Depo. 99:21; Deposition of Nancy Cooper, November 7, 2023 (“Cooper Depo.”), 189:20–190:7. (The excerpts from the Cooper Deposition cited herein are also attached as Exhibit 13 to the Stracher Declaration).

49. The Article begins:

Can you defame a religion, especially one that doesn’t believe in God, Satan or the supernatural?

The answer to that question could cost four former members of The Satanic Temple (TST) more than \$140,000 in damages, including “reputation losses,” in a civil lawsuit that has dragged on for more than a year and a half.

Compl. Ex. 1.

50. The Article then sets forth the claims in the Washington Lawsuit, provides some background on The Satanic Temple’s founding and history, and describes the involvement of each defendant in the organization. *Id.* The Article also outlines other recent legal disputes involving The Satanic Temple, reports on complaints other former members have made about The Satanic Temple’s practices, and includes responses from Greaves and Kezhaya. *Id.* Finally, the Article details the holding of the federal court that dismissed Plaintiff’s claims, notes that “[The Satanic Temple’s] brand is still under debate in Seattle,” and concludes with comments from both sides in the Washington Lawsuit on the relative merits of their positions. *Id.*

51. As background, and as part of the reporting on other complaints made by other former members, the Article includes Jinx Strange’s quote that he ceased his involvement with The Satanic Temple after hearing “[a]ccounts of sexual abuse being covered up in ways that were more than anecdotal” (the “Article Statement”). *Id.*

52. While Duin found the Article Statement “inherently plausible,” she did not intend to accuse The Satanic Temple of any wrongdoing by including the Article Statement in the Article. Duin Depo. 134:23–135:1; *see also* Duin Depo. 99:13–15 (“[The Article] was not an investigation into the sexual abuse or the finances or the alt-right figures.”).

53. Rather, Duin included the Article Statement “[b]ecause it gave a general view of the various controversies surrounding The Satanic Temple.” Duin Depo. 100:1–2.

54. Duin “was looking for . . . [Jinx Strange’s] perception of what The Satanic Temple was about. What he thought, what his experience was, what he was hearing from other people.” Duin Depo. 102: 5–9.

55. Two paragraphs after the Article Statement, the Article includes Lucien Greaves’ statement that he considers complaints about The Satanic Temple “old news” and that, “We get

this litany of senseless disparaging claims against us that says we're a religious group acting in a nefarious manner." Compl. Ex. 1.

56. Duin put Greaves's general denial about claims made against The Satanic Temple after the Article Statement because she believed Greaves's denial applied to the "various accusations" made against The Satanic Temple, including the Article Statement. Duin Depo. 128:20–129:7.

Editing the Article

57. Nancy Cooper is the Global Editor in Chief of Newsweek. Cooper Depo. 4:20–22

58. Nancy Cooper edited the Article. Cooper Depo. 155:17–19, 158:22–159:3.

59. Cooper did not know anything about The Satanic Temple prior to hearing Duin's pitch for the Article. Cooper Depo. 145:22–146:5.

60. Cooper had "faith in [Duin's] reporting." Cooper Depo. 233:4–7.

61. Cooper testified that Duin was hired as a religion reporter for Newsweek because "[s]he was an experienced religion reporter," who had "won [] awards," and was "interested in the topic and knew about it." Cooper Depo. 70:6–13.

62. Regarding Duin's experience as a reporter, Cooper further testified that "she clearly knew what she was talking about. She was an experienced reporter . . . [S]he had been a reporter for other news outlets and covered religion for them." Cooper Depo. 203:8–23.

63. Newsweek relied on Duin to fact check her articles. Cooper Depo. 140:21–24.

64. Duin represented to Cooper that she had "fact-checked this [Article] until [her] eyes were bleary." Cooper Depo 183:7–17; *see also* Stracher Decl. Ex. 14 at COOPER49 ("Whew . . . have factchecked until I am buggy-eyed.").

65. Duin typically did not provide Cooper with notes for her articles because Duin “is a very experienced senior person who was hired to be on this [religion] beat who knows this beat, and I [Cooper] don’t re-report stories. That’s not an editor’s role.” Cooper Depo. 157:16–23.

66. Cooper saw no evidence Duin was biased in her reporting on The Satanic Temple. Cooper Depo. 222:6–17.

67. Cooper understood the Article Statement to be a report of claims people were making, not an accusation of legal guilt. Cooper Depo. 209:5–14.

68. Cooper believed the Article Statement was true. Cooper Depo. 184:17–21.

69. Cooper believes that Newsweek did not intend to, and did not, defame The Satanic Temple by publishing the Article Statement. Cooper Depo. 229:6–8.

70. On October 29, 2021, Newsweek published the Article. Compl. Ex. 1.

Additional Support for The Article Statement

71. Regarding allegations of sexual abuse within The Satanic Temple, Strange recalled that:

One case was the case at the heart of the Washington Chapter issue. My understanding is that someone came forward with an allegation, and then they were immediately removed and as well as anyone it was just perceived might support them.

The second was a young woman from, I believe, the Austin TST Chapter at the time. Her name was Kylie Scenario, and very similarly, my understanding was that she had made an allegation and was immediately removed, possibly along with other supporters.

The third instance is a personal friend who confided in me something that happened to her at a—at a party.

Strange Depo. 25:1–16.

72. Regarding the sexual harassment claim he was a witness to, Johnson testified:

There was a former member of the local [Satanic Temple] group who had been, from my understanding, repeatedly made to feel uncomfortable by a much older member. . . They left because it was non-addressed for months, and then I found out about it in 2020.

Johnson Depo. 11:7–13.

73. Regarding other accounts of sexual abuse he had hear about, Johnson testified that:

[T]he most significant one would be a member of what was then The Satanic Temple, Austin chapter, who claimed that they were sexually assaulted by a chapter head. And in response to this, the—my understanding is that the chapter head and their partner, who was the leader of a Dallas group, created a doxing website to attack the person who talked about being sexually assaulted . . . The person in Austin who posted about it had public Facebook posts talking about their experience

Johnson Decl. 26:9–22.

74. Johnson also testified that:

[The Satanic Temple] has a holiday called Lupercalia . . . It's a celebration of sexuality, supposedly. I know that the co-owner of [The Satanic Temple], Doug Misicko, used to solicit nudes for that. I don't know how comfortable everyone was with those things, but I know that some people talked about how Luercalia made them feel uncomfortable.

Johnson Decl. 26:24–27:5.

75. Regarding his removal from the Washington Chapter, Sullivan testified:

My expulsion [from The Satanic Temple] was a part of . . . covering up the ethics complaint where the harassment was an underpinning factor. The chapter head at the time explicitly said that the—the reason for my removal was because I was a witness to that e-mail.

Sullivan Depo. 16:3–8.

76. Jex Blackmore is a former member of The Satanic Temple. Stevens Depo., 130:6–15.

77. In August 2018, Blackmore wrote an article published on Medium in which she wrote:

While I was part of the organization, [The Satanic Temple], I witnessed male members of the organization exploit their position and influence to behave inappropriately and disrespectfully towards women. I myself experienced harassment and abuse from members who have now left the organization. I know that my experience is one of many examples of systemic gaslighting, degradation and bullying that many women have experienced within [The Satanic Temple] over the years.

Stevens Depo. 135:18–136:13; Stracher Decl. Ex. 15 at 4.

78. Dr. Laycock’s book, *Speak of the Devil*, references Blackmore’s article and states that, “[Blackmore] reported experiencing harassment and abuse while in [The Satanic Temple].” Stracher Decl. Ex. 16 at NEWSWEEK191.

79. The Satanic Temple has admitted that “[o]ver the years we received a handful of complaints that were sexual in nature but not ‘sexual assault.’” Stracher Decl. Ex. 17 at 3.

80. One such complaint was submitted by Enid Cooper, a former member of The Satanic Temple San Jose, in December 2017. *Id.*

81. Enid Cooper complained that: “One of the leadership, Miles Teg (Gus Hernandez) pulled me aside during the picnic and mentioned that he had seen me online and thought I was ‘beautiful.’ I politely declined because I was with my date and excused myself to go back to my seat. At this point, he followed me to my table where I was seated with my date and proceeded to talk about his piercing on his penis, even going as far as looking for objects that were comparable in shape to his genitals.” *Id.*

82. Regarding Enid Cooper’s complaint, The Satanic Temple’s 30(b)(6) witness testified:

Enid Cooper had made some complaints to national council and then was being very, very aggressive in not leaving, what are you going to do about it, what are

you going to do about it, what are you going to do about it, repeatedly and very quickly, and that that led to some frustration because it's like you never want to tell somebody who is filing a complaint like to not . . . but at the same time sometimes looking in to things takes time, and Enid Cooper was not having I guess any of that.

Stevens Depo. 73:13–74:3.

83. In April 2020, a complaint was lodged against The Satanic Temple Austin
Stracher Decl. Ex. 17 at 1.

84. The Satanic Temple admitted that:

- A [Satanic Temple] Austin member (Laura Smith) emailed NC [National Council] with the allegation that the [Satanic Temple] Austin Chapter Head (Shelby Scates) sexually assaulted another person (Kiley) whom they were friends with.
- NC's initial response was to encourage Kiley to file a police response, due to the seriousness of the allegations. She refused.
- (May) Laura Smith and other friends of Kiley reached out to individual [Satanic Temple] members to "warn" them with these claims. This escalated to them threatening to "go public" with the claim that TST was "covering up" the accusations.
- (June) Shelby emailed NC stating that he was stepping down from leadership and away from [The Satanic Temple].

Id.

85. Regarding the Austin Chapter Complaint, The Satanic Temple's 30(b)(6) witness testified:

[T]he allegation was that Shelby sexually assaulted Kiley. The report was e-mailed in by a person who was a friend of Kiley's and an ex of Shelby's . . . Over the course of the following month or so . . . it seemed like there was a lot of effort to reach out to people, [The Satanic Temple] members individually, to, you know, warn people, sway people . . . and it got to a point where someone, it was Laura, threatened to go public quote unquote, whatever that means, with the claim that [The Satanic Temple] was covering up these accusations, and it was at that point that Shelby stepped down.

Stevens Depo. 111:5–25.

86. Regarding the Austin Chapter's response to the Austin Chapter Complaint, The Satanic Temple's 30(b)(6) witness testified that after the alleged perpetrator "stepped down" from his leadership position, the alleged victim and people who continued to raise the issue at Chapter meeting were removed from the Austin Chapter. Stevens Depo. 114:10–23, 115:5–12, 117:4–6, 117:12–20.

87. In addition to the above testimony, there are numerous social media posts in which individuals purporting to be former members of The Satanic Temple have publicly recounted experiences of sexual abuse within The Satanic Temple and expressed their frustration with how such complaints were handled, including:

- A Facebook post and a X (formerly Twitter) post by a former Satanic Temple member, Rumor Solanine, dated May 2, 2021, in which the author shared screenshots of a chat with Southern California Satanic Temple leaders, and stated, "It's such a shame @satanic_temple_ turned out to be so hypocritical[.] We all had such high hopes for them[.] Covering up abusive behavior from your leaders to maintain an external image is gross[.] Punishing the victims and rewarding the abusers is gross[.] TST should be ashamed." Stracher Decl. Ex. 18.
- A series of Facebook posts by a former Satanic Temple Member, "D.E.M.," dated March 8, 2020, in which the author described their experience of sexual harassment within the then-Seattle chapter of The Satanic Temple, stating, "First, the same [Satanic Temple] member was allowed to sexually harass me, over 5 reported counts, and even going as far as looking up my dress during The Womxns March movement while licking his lips, with the chapter doing nothing to prevent it from happening." The same person also stated on May 8, 2020, "I left The Satanic Temple then Seattle Chapter, now known as the WA State Chapter, in 2017 following the lack of action and care when I stepped forward, multiple times with proof, that I was being sexually harassed and groomed by an older member of the chapter since 2015. That member wasn't removed until 7 months later, when other femme presenting members said they were now being harassed, as well. [The Satanic Temple] WA then sent out an e-mail stating a member had been removed for inappropriate behaviors towards other members. In that e-mail, they anonymously mentioned my reports, by stating 'There were reports made by previous members, but those could of been handled between each other, and we didn't feel it necessary to intervene.'" Stracher Decl. Ex. 19.
- A Reddit thread, from a former Satanic Temple member in the Philadelphia area dated February 15, 2020, in which the former member claims they were attending a Satanic Temple event at which there was "lots of unwanted touching, kissing, [and] a lot of pressure to be sexual and very 'out.'" Stracher Decl. Ex. 20.

- A series of Facebook posts by a former member of The Satanic Temple Austin Chapter, who stated on September 11, 2020, “Guess who just got banned from [The Satanic Temple] for filing a report about a member of leadership in [The Satanic Temple] raping them along with everyone that has been talking to the police. This gal!” Stracher Decl. Ex. 21.

88. Within The Satanic Temple, member complaints about violations of The Satanic Temple code of conduct, including allegations of sexual assault, are handled by the Suryan Council. Greaves Depo. 19:16–19; Stevens Depo. 12:20–25, 25:24–26:15.

89. The Suryan Council was not formed until 2020. Stevens Depo. 13:11–16.

90. Prior to the formation of the Suryan Council, The Satanic Temple lacked a formal process for handling complaints, including complaints involving sexual abuse. Stevens Depo. 82:19–83:4.

91. Prior to 2020 there were complaints that were not formally addressed. Stevens Depo. 83:9–12.

92. The Satanic Temple did not conduct any investigation into Blackmore’s claims from the Medium article. Greaves Depo. 74:4–8.

Dated: May 17, 2024

Respectfully submitted,

/s/Cameron Stracher

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CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2024, I caused a true copy of the foregoing to be served on all counsel of record via ECF.

/s/ Sara C. Tesoriero
Sara C. Tesoriero, Esq.